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Attorneys for Plaintiff  
BLUE CROSS AND BLUE SHIELD ASSOCIATION

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

BLUE CROSS AND BLUE SHIELD  
ASSOCIATION, an Illinois not-for-profit  
corporation,

Plaintiff,

v.

DIGI REAL ESTATE FOUNDATION, et  
al.,

Defendants.

No. C 07 5009 RS

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING CASE  
MANAGEMENT CONFERENCE**

Action Filed: September 27, 2008  
Trial Date: None

**STIPULATION**

WHEREAS, the Initial Case Management Conference in this action is currently set for  
Wednesday, January 16, 2008, at 2:30 p.m.;

WHEREAS, Plaintiff Blue Cross and Blue Shield Association has been engaged in  
settlement discussions with the named Defendants (the "Digi Real Estate Defendants") against  
whom it has brought its First through Fifth Claims in its Complaint in this action—and who are  
the relevant stakeholders for its Sixth Claim in its complaint in this action, because they are the  
owners of the Internet domain-name registrations against whom that in rem claim is brought;

WHEREAS, Plaintiff Blue Cross and Blue Shield Association and the Digi Real Estate  
Defendants believe that having additional time before having to complete and file the Joint Case

Management Statement and appear at the Initial Case Management Conference would allow them to concentrate on their settlement discussions—and may lead to resolution of the First through Sixth Claims in the Complaint in this action before the Initial Case Management Conference;

WHEREAS, Plaintiff Blue Cross and Blue Shield Association has been engaged in settlement discussions with the relevant non-party stakeholders (the “DigiMedia Stakeholders”) for its Seventh Claim in its complaint in this action, who are the owners of the Internet domain-name registrations against whom that in rem claim is brought;

WHEREAS, Plaintiff Blue Cross and Blue Shield Association believes that having additional time before having to complete and file the Joint Case Management Statement and appear at the Initial Case Management Conference would allow it to concentrate on its settlement discussions with the DigiMedia Stakeholders—and may lead to resolution of the Seventh Claim in the Complaint in this action before the Initial Case Management Conference;

THEREFORE, the Parties in this action, through their counsel of record, hereby stipulate that the Initial Case Management Conference in this action be continued for 60 days are such other date that may be available and as may be set by the Court—with any Federal Rule 26 or Local Rule 16-9 deadlines triggered by the Initial Case Management Conference being re-set in line with the new, continued date.

DATED: January 8, 2008

HANSON BRIDGETT MARCUS  
VLACHOS & RUDY, LLP

By: /s/

SUSAN G. O’NEILL  
Attorneys for Plaintiff  
BLUE CROSS AND BLUE SHIELD  
ASSOCIATION

DATED: January 8, 2008

NEWMAN AND NEWMAN

By: /s/

DEREK A. NEWMAN  
Attorneys for Defendants  
DIGI REAL ESTATE FOUNDATION  
KANWARDEEP JOHAR  
OLEKSIY KOVYRIN  
GALT NETWORKS, INC.

SIGNATURES UNDER GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the United States District Court, Northern District of California, I, Susan G. O'Neill—the ECF User whose User ID and Password are used in the filing of this document—hereby attest that the concurrence to the filing of this document has been obtained from the other signatory to this document.

/s/  
\_\_\_\_\_  
SUSAN G. O'NEILL

ORDER

Pursuant to stipulation, IT IS SO ORDERED: the Initial Case Management Conference in this case is continued to Wednesday, \_\_\_\_\_, 2008 at 2:30 p.m., with any Federal Rule 26 or Local Rule 16-9 deadlines triggered by the Initial Case Management Conference re-set in line with this new, continued date.

DATED: \_\_\_\_\_, 2008

\_\_\_\_\_  
HONORABLE RICHARD SEEBORG  
U. S. MAGISTRATE JUDGE